

1 **STIP**

2 ROGER C. BAILEY, ESQ.
3 Nevada Bar Number 12552
4 830 S. 4th Street
5 Las Vegas, Nevada 89101
6 Tel. 702.333.3333 x 393
7 Fax: 702.444.4455
8 roger@thedefenders.net
9 Attorney for DEFENDANT

10 **UNITED STATES DISTRICT COURT**
11 **IN AND FOR THE DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA,)
13 vs.)
14 MAHOGANY BOYD,)
15 Defendant.)
16 _____)

17) Case No.: 2:20-CR-235-JAD-NJK

18) **STIPULATION TO MODIFY THE**
19) **CONDITIONS OF PRETRIAL RELEASE**

20) (FIRST REQUEST)

21 *Certification:* This stipulation is filed pursuant to General Order 2007-04.

22 IT IS STIPULATED between the defendant MAHOGANY BOYD through her
23 attorney ROGER C. BAILEY, ESQ., and the United States of America, through
24 CHRISTOPHER BURTON, Assistant United States Attorney, that the pretrial release
25 condition requiring random drug testing be removed as a condition of release because of
26 medical hardship.

27 This Stipulation is entered into pursuant to General Order 2007-04 and based
28 upon the following:

- 29 1. There have been no previous requests for removal of any of the conditions
30 of release in this case.
- 31 2. Defendant's physical condition has deteriorated as a result of her severe
32 medical condition.
- 33 3. The parties agree to the removal of the condition no longer requiring
34 random drug testing.
- 35 4. Denial of this request for continuance would cause the defendant to suffer
36 extreme hardship due to her ongoing medical condition.

- 1 5. For the above stated reasons, the parties agree to the removal of the
- 2 condition no longer requiring random drug testing.
- 3 6. This is the first request for modification of pretrial release conditions in this
- 4 case.
- 5 7. The Defendant is out of Custody and does not object to the modification.

6 DATED this 15th day of April.

7 RESPECTFULLY SUBMITTED BY:

9 /s/ Christopher Burton
10 CHRISTOPHER BURTON
11 Assistant United States Attorney

9 /s/ Roger C. Bailey
10 ROGER C. BAILEY, ESQ.
11 Attorney for MAHOGANY BOYD

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

STIP

ROGER C. BAILEY, ESQ.
Nevada Bar Number 12552
830 S. 4th Street
Las Vegas, Nevada 89101
Tel. 702.333.3333 x 393
Fax: 702.444.4455
roger@thedefenders.net
Attorney for DEFENDANT

UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
)
Plaintiff,
)
vs.
)
MAHOGANY BOYD,
)
Defendant.
)

)

Case No.: 2:20-CR-235-JAD-NJK

STIPULATION TO MODIFY THE CONDITIONS OF PRETRIAL RELEASE

(FIRST REQUEST)

FINDINGS OF FACT

Based upon the submitted Stipulation, and good cause appearing therefore, the Court finds that:

1. Requiring the Defendant to submit to random drug testing as a condition of pretrial release is overburdensome given her severe medical condition.
2. This stipulation complies with General Order 2007-04.

CONCLUSIONS OF LAW

1. Denial of this request for continuance would impose an extreme hardship on the Defendant given her current medical condition.
2. For all the above stated reasons, the ends of justice would best be served by a modification of the pretrial release conditions.

1 3. This is the first request for a modification of the conditions for pretrial
2 release.
3
4

ORDER

5 **IT IS ORDERED** that the pretrial release condition requiring random drug testing
6 be removed.
7
8

9 **IT IS SO ORDERED:**

10 
11 _____
12 UNITED STATES DISTRICT JUDGE
13
14

15 DATED: 4/20/2021
16
17
18
19
20
21
22
23
24
25
26
27
28